

Streamlining the Methodology Approval Process

1 ABSTRACT

In recent years, Verra staff have become more involved in the methodology approval process (MAP) in order to provide technical and editorial guidance. Verra believes our involvement has led to more robust methodologies that exhibit more consistent structure and clarity. In addition, many technical issues that have traditionally been resolved during one of the validation/verification body (VVB) assessments are being addressed during early-stage reviews conducted by Verra staff. At the same time, Verra's increased involvement in the process has added additional, and sometimes significant, time to the overall approval process, without any corresponding reduction in costs related to VVB assessments. As a means to ensure that the VCS Program continues to serve as a source of innovative carbon accounting methodologies, and to reduce the time and expense of the methodology approval process, Verra is considering removing the first VVB assessment from the methodology approval process and ensuring proper review by Verra staff of the methodology against VCS Program requirements throughout the process.

2 BACKGROUND

The original design of the MAP was such that Verra staff were meant to have limited involvement in providing technical and editorial guidance. However, Verra has found that in the absence of more direct guidance, including in respect of methodology structure and clarity, the result was that methodologies were quite inconsistent in this regard.

Accordingly, Verra staff have been conducting more in-depth reviews of new methodologies and methodology revisions prior to the 30-day public comment period, and throughout the remainder of the process. While Verra believes that these in-depth reviews have led to the development of improved and more consistent methodologies, they have also added additional, sometimes significant, time to the overall process.

During VVB methodology assessments, many findings raised are related to VCS rules and requirements, instructions set out in methodology templates, or general greenhouse gas (GHG) accounting principles. As Verra staff are well-versed in each of these, we are well-equipped to identify where methodologies do not fully comply with these requirements.

Considering the above, Verra is considering removing one of the two VVB assessments currently required by the MAP. Verra believes this would make the MAP more efficient by reducing the amount of time that is required for methodologies and methodology revisions to be approved under the VCS Program. This proposal would also reduce the overall cost of the MAP, as methodology developers would only need to pay for one VVB assessment and the additional costs related to Verra staff review (see below). Finally, more direct involvement in the approval process would allow Verra to continue to provide detailed guidance and direction on methodologies.

3 PROPOSAL

Verra proposes to remove one of the two VVB assessments currently required by the MAP. Accordingly, during its reviews, Verra staff will continue to focus on ensuring that the methodology is well-structured and clear, there is logical and technical consistency within the methodology, and that there are no major inconsistencies with VCS Program rules and requirements. Verra staff will also continue to highlight any technical matters that are outside of our expertise, which we will ask the VVB to review during its assessment.

In addition, Verra proposes to update the process by which VVBs are selected to conduct methodology assessments as a means to ensure that the single methodology assessment is carried out by a VVB with sufficient technical expertise and experience. Specifically, Verra will take on the responsibility of sending a request for proposals (RFP) to all VVBs which meet the relevant eligibility criteria to conduct the methodology assessment (currently set out in Section 5.1 of VCS document *Methodology Approval Process*). Upon receipt of any RFPs, Verra would narrow the pool of eligible VVBs based on those with the most relevant expertise and experience. Verra would then forward the remaining RFP(s) to the methodology developer, and would leave the methodology developer to make a selection amongst the eligible pool of VVBs provided by Verra. Verra would contract directly with the VVB selected by the methodology developer, with the cost of the assessment covered by the methodology developer, per the current process for second assessments.

Finally, because Verra staff have been spending additional time reviewing methodologies, Verra proposes to update the fees associated with the MAP in order to help cover the cost of our review, as set out in the following table:

Fee Type	Current Fees	Proposed Fees
<i>New methodologies and substantive revisions:</i>		
• Methodology concept note application fee	USD 2,000	USD 2,000
• Processing fee where Verra accepts the methodology element into the approval process	USD 8,000	USD 13,000
Total	USD 10,000	USD 15,000
<i>Minor methodology revisions:</i>		
• Methodology concept note application fee	USD 1,250	USD 1,500
• Processing fee where Verra accepts the methodology element into the approval process	USD 3,750	USD 6,000
Total	USD 5,000	USD 7,500

Verra welcomes general comments on this proposal, and requests specific feedback on the following:

- Will the removal of one VVB assessment help to reduce the time and overall cost of the methodology approval process, and is the proposed process for VVB selection reasonable?
- Do you have feedback on the process and scope of Verra staff reviews?